

ORIGINAL

Espinosa.Mtn

LEONARDO M. RAPADAS
United States Attorney
KARON V. JOHNSON
Assistant U.S. Attorney
Suite 500, Sirena Plaza
108 Hernan Cortes
Hagåtña, Guam 96910
Telephone: (671) 472-7332/7283
Telecopier: (671) 472-7334/7215

FILED
DISTRICT COURT OF GUAM

AUG 28 2006 *mba*

MARY L.M. MORAN
CLERK OF COURT

Attorneys for United States of America

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF GUAM**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CHRISTOPHER M. ESPINOSA,

Defendant.

CRIMINAL CASE NO. 05-00053


**GOVERNMENT'S MOTION FOR
SUBSTANTIAL ASSISTANCE
DEPARTURE**

The United States hereby moves this Honorable Court for a departure from the Guidelines level, as provided by USSG Section 5K1.1, on the basis that defendant has rendered substantial assistance to the government in its investigation of drug trafficking on Guam.

The government is filing under seal a separate sentencing memorandum concerning the details of that cooperation. The government is recommending that defendant receive a sentence of 87 months incarceration.

RESPECTFULLY SUBMITTED this 26th day of August, 2006.

LEONARDO M. RAPADAS
United States Attorney
Districts of Guam and the CNMI

By: 
KARON V. JOHNSON
Assistant U.S. Attorney